

REMARKS

Claims 16, 26, and 29 are amended. Claims 16-23 and 25-58 remain in the application for consideration. In view of the following remarks, Applicant respectfully requests allowance of the subject application.

Teleconference with Examiner

Applicant and the Examiner Ries conducted a teleconference on October 31, 2006. During the teleconference, Applicant and the Examiner discussed the references cited by the Office and the Office's position with respect to the subject claims. Applicant and Examiner agreed that the preferred course of action is for Applicant to substantively respond to the non-final Office Action and, if a final Office Action is then issued, to conduct another teleconference to discuss advancing the prosecution of this application. No other specific agreements or conclusions were made.

Applicant is greatly appreciative of the Examiner's time and willingness to advance prosecution in a meaningful and expeditious manner.

§112, Second Paragraph, Rejection

Claims 16-23 and 25-30 stand rejected as being indefinite under 35 U.S.C. §112, Second Paragraph, as allegedly being indefinite. Specifically, the Office states that with respect to independent claims 16, 26 and 29, two separate functions are labeled as number (1).

Applicant has amended independent claims 16, 26 and 29 appropriately. Accordingly, Applicant respectfully requests that the rejection under §112, second

paragraph, be withdrawn.

§103 Rejections

Claims 16-23 and 25-58 stand rejected under U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,537,526 to Anderson et al. (hereafter "Anderson") in view of U.S. Patent No. 5,564,263 to Bergman et al. (hereinafter "Bergman"), and further in view of U.S. Patent No. 6,556,217 to Makipaa et al. (hereinafter "Makipaa").

In addition, claims 31-42 are rejected under U.S.C. §103(a) as being unpatentable over U.S. Patent Publication No. 2005/0108637 to Sahota (hereinafter "Sahota").

The §103 Rejections over Anderson, Bergman and Makipaa

Claim 16, as amended, recites a web content adaptation method comprising [added language in bold italics]:

- analyzing one or more functions associated with a webpage that is configured for presentation on a first device type, said analyzing being performed by generating one or more function-based object models that represent objects comprising the webpage,
 - said objects comprising:
 - one or more basic objects associated with the webpage, basic objects comprising a smallest information body that cannot be further divided, said one or more basic objects being configured to perform one or more of the following functions: (1) providing semantic information, (2) navigating to other objects, (3) providing a visual effect on the webpage, and (4) enabling user interaction; and
 - one or more composite objects associated with the webpage, composite objects comprising objects that contain other objects, said one or more composite objects having a

1 clustering function that is associated with a webpage author's
2 intention; and

- 3 • based on said analyzing, adapting the webpage for presentation on a
4 second device type that is different from the first device type.

5 In making out the rejection of this claim, the Office asserts that its subject
6 matter is obvious in view of the teachings of Anderson, Bergman, and Makipaa.
7 First, the Office argues that it would have been obvious to modify Bergman into
8 Anderson "in order to provide a *unified framework*." (emphasis added). Next, the
9 Office notes that Anderson and Bergman "do not explicitly disclose to adapt the
10 webpage for presentation on a second device type that is different from the first
11 device type." The Office then refers to Makipaa and asserts that it discloses
12 "adapting page to be displayed based on the device capabilities." The Office then
13 argues that it would have been obvious to have "modified Makipaa into Anderson
14 and Bergman to provide a way to adapt a page *based on device capabilities*, as
15 taught by Makipaa, incorporated in the systems of Anderson and Bergman, in
16 order to allow *maximum utilization* of a device for the user." (emphasis added).

17 Applicant respectfully disagrees and submits that the Office has not
18 established a *prima facie* case of obviousness. First, Applicant is unable to find
19 any reference to "analyzing one or more functions associated with a webpage" in
20 the Anderson reference. In fact, ***Anderson does not even mention a "webpage" at***
21 ***all***. Furthermore, the Office's reliance on "one or more commands associated with
22 the document" as disclosing "analyzing", is misplaced because the "one or more
23 commands" are simply standard commands always provided by the disclosed
24 framework. As such, it remains unclear what feature of Anderson is relying on for
25 "analyzing" – especially analyzing that is "performed by generating one or more

1 function-based object models that represent objects comprising the webpage”, as
2 claimed. Still further, the Office has not even indicated what feature of Anderson
3 it is equating with “objects comprising the webpage”, as claimed. Indeed, the only
4 information provided in this regard is the Office’s reliance on Anderson’s
5 “TModelCommand” – which encapsulates “a user action which changes the
6 model”. (see Anderson, Column 13 (lines 15-17)). However, this appears to be
7 unrelated to any analysis of “one or more functions associated with a webpage” or
8 to “generating one or more function-based object models that represent objects
9 comprising the webpage”, as claimed.

10 In addition, even if the Office had indicated what feature of Anderson it is
11 equating with “said objects”, which it has not, Columns 1(line 59) through 2 (line
12 5) do not disclose “one or more basic objects associated with the webpage, basic
13 objects comprising a smallest information body that cannot be further divided”, as
14 claimed. Instead, this excerpt discusses the “objects of the present invention” –
15 which, for obvious reasons, cannot be equated with “one or more basic objects
16 associated with the webpage”, as claimed. As such, Anderson cannot possibly
17 disclose “said one or more basic objects being configured to perform one or more
18 of the following functions...”, as claimed.

19 Furthermore, with respect to Bergman, the Office argues that Columns 6,
20 17 and 21 disclose “composite objects ... having a clustering function that is
21 associated with a webpage author’s intention”. However, Applicant is unable to
22 find any discussion of “a clustering function that is associated with a webpage
23 author’s intention” in these excerpts. Accordingly, Applicant requests that the
24 Office specifically identify which language/feature(s) of Bergman it is relying on
25 for disclosing this subject matter.

1 Finally, the Office characterizes Makipaa as disclosing "...adapting the
2 webpage for presentation", as claimed. Applicant respectfully disagrees and
3 reminds the Office that this claim recites "adapting" that is "based on said
4 analyzing". In stark contrast, Makipaa actually teaches directly away from this by
5 teaching to display an element by "resizing" it *based on the profile of the*
6 *displaying terminal*. (see e.g. Makipaa, Summary of Invention) (emphasis added).

7 Second, as Applicant noted in its previous response (mailed March 14,
8 2005), the Office has failed to present a convincing line of reasoning that explains
9 *why* it would have been obvious to incorporate these teachings. Specifically, the
10 Office has not explained how the document architecture of Anderson would
11 benefit from the teachings of Bergman. Instead, the Office simply argues that a
12 unified framework would be provided "which describes the multiple
13 modalities/multiple fidelities nature of many multimedia objects, including
14 metadata description of the spatial and temporal behavior of the object through
15 space and/or time" (see Office Action, Page 15). However, the Office appears to
16 forget that the main goal of the framework in Anderson is to provide system level
17 support for *particular document processing features* by various applications (see,
18 e.g. Column 3 (lines 7-12 and 34-51)) (emphasis added). As such, merely
19 describing what a unified framework is (by using language from Bergman itself)
20 fails to explain *why* one would have been motivated to modify Anderson to
21 provide such a framework.

22 Perhaps more importantly, with respect to the proposed modification of
23 Anderson with Makipaa, the Office's stated motivation "to allow *maximum*
24 *utilization*" simply pertains to improving efficiency – which could be used to
25 justify almost *any* modification of Anderson/Bergman and fails to explain *why* the

1 proposed combination would have been obvious. In this regard, the Office also
2 argues that one would have been motivated so that while displaying information
3 on a different device with a smaller display area, little or no information would be
4 lost or sacrificed. (see Office Action, Page 17). However, this reasoning is
5 misplaced because Anderson is not concerned with how information is displayed.
6 In fact, Anderson specifically states: "**the document framework does not specify**
7 **any policy or user interface decisions**. These details will be provided by the
8 particular applications using the document framework." (Anderson, Column 3
9 (lines 48-51). (emphasis added).

10 Accordingly, in view of the above discussion, the Office has not established
11 a *prima facie* case of obviousness. Hence, for at least this reason, this claim is
12 allowable.

13 **Claims 17-23 and 25** depend from claim 16 and are allowable as
14 depending from an allowable base claim. These claims are also allowable for their
15 own recited features which, in combination with those recited in claim 16, are
16 neither disclosed nor suggested in the references of record, either singly or in
17 combination with one another.

18 **Claim 26**, as amended, recites a web content adaptation method comprising
19 [added language in bold italics]:

- 20
21 • analyzing one or more functions associated with a webpage by
22 generating one or more function-based object models that represent
23 objects comprising the webpage,
 - 24 ○ said objects comprising:
 - 25 ■ one or more basic objects associated with the webpage, basic
objects comprising a smallest information body that cannot be
further divided, said one or more basic objects being
configured to perform one or more of the following functions:

- (1) providing semantic information, (2) navigating to other objects, (3) providing a visual effect on the webpage, and (4) enabling user interaction; and
- one or more composite objects associated with the webpage, composite objects comprising objects that contain other objects, said one or more composite objects having a clustering function that is associated with a webpage author's intention; and
- based on said analyzing, adapting the webpage for presentation on a device.

In making out the rejection of this claim, the Office relies on the same argument that it made in regard to claim 16. Accordingly, for the reasons given above, Applicant respectfully submits that the Office has not established a *prima facie* case of obviousness. Hence, for at least this reason, this claim is allowable.

Claims 27-28 depend from claim 26 and are allowable as depending from an allowable base claim. These claims are also allowable for their own recited features which, in combination with those recited in claim 26, are neither disclosed nor suggested in the references of record, either singly or in combination with one another.

Claim 29, as amended, recites one or more computer-readable storage media having computer-readable instructions thereon which, when executed by one or more processors, cause the one or more processors to [added language in bold italics]:

- analyze one or more functions associated with a webpage that is configured for presentation on a first device type by generating one or more function-based object models that represent objects comprising the webpage,
 - said objects comprising:
 - one or more basic objects associated with the webpage, basic objects comprising a smallest information body that cannot be

further divided, said one or more basic objects being configured to perform one or more of the following functions: (1) providing semantic information, (2) navigating to other objects, (3) providing a visual effect on the webpage, and (4) enabling user interaction; and

- one or more composite objects associated with the webpage, composite objects comprising objects that contain other objects, said one or more composite objects having a clustering function that is associated with a webpage author's intention;
- said generating of the one or more function-based object models comprising generating at least one function-based object model for a basic object, said at least one function-based object model being generated as a function of one or more of the following properties: (1) a presentation property that defines a way in which the object is presented, (2) a semanteme property associated with content of an object, (3) a decoration property pertaining to an extent to which the basic objects serves to decorate the webpage, (4) a hyperlink property pertaining to an object to which the basic object points via a hyperlink, and (5) a interaction property pertaining to an interaction method of the basic object;
- said generating further comprising generating at least one function-based object model for a composite object, said at least one function-based object model for the composite object being generated as a function of one or more of the following properties: (1) a clustering relationship property pertaining to a relationship among root children of the composite object, and (2) a presentation relationship property pertaining to a presentation order associated with the root children of the composite object;
- said generating further comprising generating at least one specific function-based object model that serves to categorize an object by:
 - for a basic object, generating said at least one specific function-based object model based upon properties of the basic object and properties associated with any father or brother objects; and
 - for a composite object, generating said at least one specific function-based object model based upon properties of the composite object and any of its root children; and
- based upon an analysis of said one or more functions, adapt the webpage for presentation on a second device type that is different from the first device type.

1
2 In making out the rejection of this claim, the Office relies on the same
3 argument that it made in regard to claim 16. Accordingly, for the reasons given
4 above, Applicant respectfully submits that the Office has not established a *prima*
5 *facie* case of obviousness. Hence, for at least this reason, this claim is allowable.

6 **Claim 30** depends from claim 29 and is allowable as depending from an
7 allowable base claim. This claim is also allowable for its own recited features
8 which, in combination with those recited in claim 29, are neither disclosed nor
9 suggested in the references of record, either singly or in combination with one
10 another.

11 **Claim 31** recites a web content adaptation method comprising:

- 12
- 13 • receiving multiple web pages that are configured for display on a
first device type;
 - 14 • processing the multiple web pages to provide multiple different
objects associated with the webpages, individual objects having one
15 or more properties relating to functions of the individual object;
 - 16 • applying one or more rules to the objects sufficient to provide
multiple different webpages that are configured for display on a
17 second device type that is different from the first device type.
- 18

19 In making out the rejection of this claim, the Office relies on the same
20 argument that it made in regard to claim 16. Accordingly, for the reasons given
21 above, Applicant respectfully submits that the Office has not established a *prima*
22 *facie* case of obviousness. Hence, for at least this reason, this claim is allowable.

23 **Claims 32-42** depend from claim 31 and are allowable as depending from
24 an allowable base claim. These claims are also allowable for their own recited
25 features which, in combination with those recited in claim 31, are neither disclosed

1 nor suggested in the references of record, either singly or in combination with one
2 another.

3 **Claim 43** recites a web content adaptation method that adapts web content
4 from one format to another, and which uses multiple function-based object models
5 to do so, where the function-based object models comprise models that pertain to
6 (1) basic objects that comprise a smallest information body that cannot be further
7 divided, and (2) composite objects that comprise objects that can contain other
8 objects.

9 In making out the rejection of this claim, the Office relies on the same
10 argument that it made in regard to claim 16. Accordingly, for the reasons given
11 above, Applicant respectfully submits that the Office has not established a *prima*
12 *facie* case of obviousness. Hence, for at least this reason, this claim is allowable.

13 **Claim 44** depends from claim 43 and is allowable as depending from an
14 allowable base claim. This claim is also allowable for its own recited features
15 which, in combination with those recited in claim 43, are neither disclosed nor
16 suggested in the references of record, either singly or in combination with one
17 another.

18 **Claim 45** recites a system for adapting web content from one format to
19 another comprising one or more function-based object models, individual
20 function-based object models representing objects that are present in a webpage in
21 terms of one or more of an object's functional properties.

22 In making out the rejection of this claim, the Office relies on the same
23 argument that it made in regard to claim 16. Accordingly, for the reasons given
24 above, Applicant respectfully submits that the Office has not established a *prima*
25 *facie* case of obviousness. Hence, for at least this reason, this claim is allowable.

1 **Claims 46-53** depend from claim 45 and are allowable as depending from
2 an allowable base claim. These claims are also allowable for their own recited
3 features which, in combination with those recited in claim 45, are neither disclosed
4 nor suggested in the references of record, either singly or in combination with one
5 another.

6 **Claim 54** recites a computer architecture for use in adapting web content
7 for display on a computing device, the architecture comprising:

- 8
- 9 • an analysis module for receiving at least one webpage and
10 processing the one webpage to produce one or more function-based
11 object models that describe functional properties of objects that are
12 contained in the one webpage;
- 13 • one or more rules modules that contain rules that are to be used to
14 adapt content contained in the webpage; and
- 15 • a content adaptation module configured to process the one or more
16 function-based object models in accordance with one or more rules
17 contained in the one or more rules modules to produce a new web
18 page that has been adapted from the one web page.

19 In making out the rejection of this claim, the Office relies on the same
20 argument that it made in rejecting claim 16. However, Applicant is confused as to
21 how that argument applies to this claim because this claim and claim 16 do not
22 expressly recite the same subject matter. As such, the Office's argument does not
23 address "an analysis module", "one or more rules modules", or "a content adaption
24 module", as claimed.

25 Nevertheless, Applicant has thoroughly scrutinized the cited references and
submits that they do not disclose or suggest this subject matter. Hence, for at least
this reason, the Office has failed to establish a *prima facie* case of obviousness.
Therefore, this claim is allowable.

1 **Claims 55-58** depend from claim 54 and are allowable as depending from
2 an allowable base claim. These claims are also allowable for their own recited
3 features which, in combination with those recited in claim 54, are neither disclosed
4 nor suggested in the references of record, either singly or in combination with one
5 another.

7 **The §103 Rejections over Sahota**

8 In making out the rejection of **claim 31**, reproduced above, the Office
9 asserts that its subject matter would have been obvious in view of the teachings of
10 Sahota. In this regard, the Office argues that Sahota discloses all the claimed
11 subject matter except for “receiving multiple web pages that are configured for
12 display on a first device type”. The Office then argues that “it was well known in
13 the art at the time of the invention that a web browser runs on a personal computer
14 device.” The Office then argues that it would have been obvious to configure web
15 pages to be displayed on a personal computer running a web browser “to create a
16 template of web pages including HTML tags and attributes in order to display text
17 and images for a personal computer display (see Sahota, Page 3, paragraph
18 [0038]).”

19 Applicant respectfully disagrees and submits that the Office has not
20 established a *prima facie* case of obviousness. Specifically, Applicant reminds the
21 Office that this claim recites “processing the multiple web pages to provide
22 multiple different objects associated with the webpages, individual objects having
23 ***one or more properties relating to functions of the individual object***”, as claimed.
24 (emphasis added). In contrast, Sahota merely teaches parsing an HTML file to
25 create an XML file that can be transformed into a displayable format by using an

1 extensible style sheet transformation (XSLT) application (see e.g. Sahota, Fig. 2b
2 and Paragraphs [0064]-[0069]). This XML file is limited to providing a semantic
3 description of the HTML document – and does not have any “properties relating to
4 *functions* of the individual object”, as claimed.

5 Accordingly, for at least this reason, Sahota fails to disclose or suggest all
6 the subject matter of this claim. Therefore, the Office has not established a *prima*
7 *facie* case of obviousness and this claim is allowable.

8 **Claims 32-42** depend from claim 31 and are allowable as depending from
9 an allowable base claim. These claims are also allowable for their own recited
10 features which, in combination with those recited in claim 31, are neither disclosed
11 nor suggested in the reference of record.

12
13 **Conclusion**

14 All of the claims are in condition for allowance. Applicant respectfully
15 requests a Notice of Allowability be issued forthwith. If the Office’s next
16 anticipated action is to be anything other than issuance of a Notice of Allowability,
17 Applicant respectfully requests a telephone call for the purpose of scheduling an
18 interview.

19
20 Respectfully Submitted

21
22 Dated: 11/16/2006

23 By: 11/16/06 [Signature]

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